

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

KINDHEARTS FOR CHARITABLE  
HUMANITARIAN DEVELOPMENT, INC.,

Plaintiff,

v.

HENRY M. PAULSON, in his official capacity as the  
Secretary of the Treasury,  
ADAM J. SZUBIN, in his official capacity as the  
Director of the Office of Foreign Assets Control, and  
MICHAEL B. MUKASEY, in his official capacity as the  
Attorney General of the United States,

Defendants.

DECLARATION OF  
JIHAD M. SMAILI

Civil No.

JUDGE JAMES G. CARR

DECLARATION OF JIHAD M. SMAILI

I, Jihad M. Smaili, hereby declare and state as follows:

1. I am currently employed as In-House Counsel for a medical corporation located in Beverly Hills, California. I served as general counsel for KindHearts for Charitable Humanitarian Development, Inc. ("KindHearts") from its inception on January 22, 2002 until it was shut down on February 19, 2006. I was also a member of KindHearts' Board of Trustees from the Board's formation until February 19, 2006. I have personal knowledge of the facts related below.

2. I have been practicing law for 10 years. I graduated *magna cum laude* in May 1998 from the Cleveland-Marshall College of Law, in Cleveland, Ohio. From 1998 until 2000, I was an Assistant Attorney General at the Office of the Ohio Attorney General, in Columbus, Ohio. From 2000 until 2002, I was an Assistant Prosecuting Attorney at the Office of the